

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 4:19CR00212 JM
)	
KESHAWN BOYKINS)	

**UNITED STATES' MOTION TO CONTINUE JURY TRIAL AND EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its counsel, Cody Hiland, United States Attorney for the Eastern District of Arkansas, and Kristin Bryant, Assistant United States Attorney for said district, respectfully moves this Court to continue the jury trial in this matter and exclude the time under the Speedy Trial Act. Counsel for the defendant has authorized the United States to state that there is no objection to this motion.

On May 8, 2019, the defendant was indicted on one count of knowingly and intentionally possessing with intent to distribute marijuana and one count of possessing a firearm in furtherance of a drug trafficking offense. On January 9, 2020, the Indictment was superseded to add an additional count of production of child pornography. The defendant is not in custody. The jury trial in this case is currently scheduled for June 22, 2020.

The undersigned has a jury trial before this Court on June 15, 2020, in *United States v. Devion Cumbie*, 4:18-CR-313 JM, and will need additional time to prepare for the jury trial in this case. Furthermore, the undersigned has a previously scheduled out of town trip planned for the week of June 22, 2020. For these reasons, the United States requests a continuance of this trial date.

In determining whether to grant a continuance, Title 18, United States Code, Section 3161(h)(7)(B)(iv), provides that the Court should consider “[w]hether the failure to grant such a

continuance would unreasonably deny the Government continuity of counsel.” In this case, the undersigned has been lead counsel since its inception, has been involved in the interviews of all witnesses, and is critical in trying this case.

The United States submits that any delay occasioned by the granting of this motion would be excluded by the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) as the ends of justice served by the granting of such continuance outweighs the best interests of the public and the defendant in a speedy trial.

WHEREFORE, the United States prays that the jury trial in this case be continued and that the time be excluded for purposes of the Speedy Trial Act.

Respectfully submitted,

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